

**CONTINUATION OF COMPLAINT**

I, Jeffrey Buttery, being duly sworn, hereby depose and state as follows:

**Introduction and Background**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI). I have worked for the FBI since 2019; I am currently assigned to the Kalamazoo Resident Agency within the Detroit Criminal Division. Since June of 2021 I have acted as the coordinator for the FBI's Western Michigan Violent Crime Task Force and investigated numerous violations of federal criminal statutes. I have also been involved in the investigation of numerous child pornography cases and have reviewed photographs and videos depicting minors (less than eighteen years of age) being sexually exploited by adults. As a result, I am familiar with methods of determining whether a child is a minor and am familiar with the child pornography laws and how child pornography violations are commonly committed.

2. I have also participated in numerous investigations into the receipt, possession, distribution, and production of child pornography by electronic means. I have executed premises search warrants and search warrants for electronic evidence used to facilitate child pornography offenses. I am thus familiar with the techniques and methods used by individuals involved in criminal activity to conceal their activities from detection by law enforcement authorities. Prior to becoming an FBI Special Agent, I was employed by the Department of Defense (DOD) as an Army Intelligence Officer and as an Inspector General with the Defense Logistics Agency.

3. This continuation is submitted for the purpose of obtaining an arrest warrant for Jordan Isaiah WATTS, DOB: XX/XX/1992<sup>1</sup> for sexual exploitation of a child (production of child pornography), in violation of Title 18, United States Code Section 2251(a). It contains only a summary of relevant facts. I have not included each and every fact known to me concerning the entities, individuals, and events described in this continuation.

### **Probable Cause**

4. This affidavit is based on a Federal Bureau of Investigations (“FBI”), Portage Police Department, and Kalamazoo County Sheriff’s Office investigation into the production of child pornography by Jordan WATTS.

5. On May 10, 2023, Jordan WATTS was arrested by Indiana State Troopers in Lake County, Indiana. During his arrest, Troopers found an Apple iPhone that belonged to WATTS (Apple iPhone 12, Model # D53gAp, Serial # DNPDT59A0DXP, IMEI # 350839224390911, MAC address B6:56:E3:1C:25:08) (hereinafter “**subject device**.”) The phone number associated with the **subject device** is 269-464-6284. This is the same phone number that Carlos Watts, Jordan WATTS’ brother, who currently resides at the Newaygo County Jail, uses to call Jordan WATTS. The **subject device** was placed into WATTS’ prisoner property. WATTS was subsequently extradited to Kalamazoo on an outstanding felony warrant, and the **subject device** was seized by the Kalamazoo County Sheriff’s

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<sup>1</sup> I am aware of Jordan Watts’ full date of birth and can provide that to the Court upon request. I have omitted it from this Continuation to protect his personal identifiable information.

Office investigators and logged into evidence.

6. On May 24, 2023, investigators swore out a State of Michigan warrant to search the **subject device**. The warrant was authorized, and the **subject device** was turned over to the Michigan State Police for extraction. During that search, investigators observed a video which appeared to depict child pornography. Investigators ceased their extraction review in order to obtain another State of Michigan warrant to search the phone for evidence of child pornography.

7. On June 16, 2023, a second State of Michigan search warrant, which included child pornography within the scope of the search, was authorized for the **subject device**. With the updated search warrant, investigators resumed their review of the contents of the **subject device**. Saved to the **subject device**, investigators found a self-recorded video of WATTS having sex with a minor girl. The video depicts WATTS' penis penetrating the victim's vagina. WATTS is identifiable by his distinct stomach tattoos and voice. In the video WATTS tells the victim to turn around and look at the camera. When she does, the victim's face is fully visible. Investigators were able to positively identify the victim.<sup>2</sup>

8. On June 22, 2023, investigators interviewed the victim and her mother, in Kalamazoo, MI. Both the mother and victim confirmed that the victim was the minor female depicted in the video found on the **subject device**. The victim confirmed that the adult male in the video was Jordan WATTS. The victim

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<sup>2</sup> The victim's full name and date of birth are known to me and available to the Court upon request. I have omitted that information from this Continuation to protect the victim's personal identifiable information.

also said that she was unaware WATTS was filming the sexual encounter, until he asked her to turn around and she saw that WATTS was recording. The victim did not give WATTS permission to produce the child pornographic video and after the sexual encounter she told WATTS to delete the video.

9. Investigators discovered electronic data on WATTS' phone which showed that on January 28, 2023, an Apple iPhone Note was created with the title "Saved Videos." Investigators determined that 40 files were added to the "Saved Videos" Note on the **subject device** between January 28, 2023, and May 10, 2023. One of those files was the video of WATTS and the minor victim, described in paragraph 7, *supra*. Investigators also conducted a review of publicly available videos posted to a Tik Tok account operated by the minor victim and found that, based on changes made to the style of the victim's hair, the video of Watts and the minor was likely filmed on March 8, 2023, or before. On March 8, 2023, the victim was 16 years old, and WATTS was 30 years old.

10. On June 25, 2023, at 3:25pm Jordan WATTS' brother, Carlos Watts, called Jordan WATTS from the Newaygo County Jail. In this phone call Jordan WATTS admits to having sex with the victim. This call was recorded. Below is a transcription of the pertinent portion of that call:

Jordan WATTS: Some detectives went to this young girl that be around JJ... she's like 20 years old, **I had hit her**. They was asking her questions about me yesterday, told her that, um...not to be in contact with me and that I'm going around messing with girls 13 and below.

*(Jordan WATTS asks another person, who is sitting with him, what the detectives said.)*

Other Male Voice: That you were messing with women...13...uh, 14 and below. And you were posting videos of them.

Jordan WATTS: That I was making videos and (unintelligible) about them.

*(Jordan WATTS laughs)*

11. Contrary to WATTS' attempt on the recorded jail call to minimize his culpability by claiming he thought the victim was 20 years' old when he had sex with her, WATTS was aware at the time he had sex with the victim that the victim was a minor. Investigators discovered on the **subject device** a text message conversation between WATTS and the victim dated April 29, 2023. In this text conversation, the victim told WATTS about an argument that she had with her mother. The victim told WATTS that she was concerned her mother would kick her out of the house. WATTS told the victim not to worry because her mother could not throw her out of the home. When the victim asked why, WATTS told the victim because "U a minor." This conversation was carried out via text message between the **subject device** and an iCloud account in the name of the victim.<sup>3</sup>

12. On July 18, 2023, the U.S. Attorney's Office sent Jordan WATTS a letter indicating that he was the target of various federal investigations, providing WATTS

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<sup>3</sup> The iCloud account information also included a screenname that the victim is known to use on social media. Both the victim's iCloud information and screenname are known to me and available to the Court upon request. I have omitted that information from this Continuation to protect the victim's personal identifiable information.

with contact information for the federal public defenders' office, and inviting WATTS and his attorney to speak with investigators. On July 23, 2023, at 11:51 pm, Kenny Valentine, an inmate at the Newaygo County Jail, called Jordan WATTS on the **subject device** phone number, 269-464-6284. Valentine called WATTS using the account of another inmate at the jail, Narciso Vasquez (Pin #202100267). On this call WATTS tells Valentine that he is worried about being the target of a federal investigation and that he is going to disappear. This call was recorded. A pertinent portion of that phone call is below:

Jordan WATTS: Can you get a message for me, bro? Have you ever heard of a target letter?

Valentine: Target letter?

Jordan WATTS: Yeah.

Valentine: For who?

Jordan WATTS: Have you ever heard of that?

Valentine: Un uh.

Jordan WATTS: Man, them bitches sent me a target letter. You hear me?

Valentine: Yeah.

Jordan WATTS: The feds sent me a target letter basically saying they want to sit down and talk with me about the shit my brother....

*(Valentine and WATTS discuss options for various federal defenders)*

Jordan WATTS: ... I ain't want to say it on my brother's phone, but it's a great possibility that I might get indicted next week. Know

what I'm saying?

*(Valentine and WATTS continue discussing options for various federal defenders)*

Jordan WATTS: But, I'm going to send you a letter...and you know how to decipher it, you feel me?

Valentine: Yeah, yeah, yup. For sure, for sure.

Jordan WATTS: And it's going to have a number on there, bro. **Because, by next week Tuesday or Wednesday I'm about to go MIA.** I want you to tell my brother that...like... fell me, like...he ain't going to be able to call or get in contact with me because I'm trying to get that money for him and me for lawyers. So it's like, he ain't going to be able... like, they snatch me up off the street next week I'm toast.

*(Valentine and WATTS discuss WATTS being the target of an investigation)*

Jordan WATTS: And, I couldn't say it on my brother's phone, because I don't want to tip them off, you feel me? So, it's like, he ain't going to be able to...like, by next week like Wednesday he ain't going to be able get in contact with me, but he going to be able to send messages to me though.

### **Conclusion**

13. In my training and experience, I submit that there is probable cause to believe that Jordan WATTS used the victim, a 16-year-old minor, to engage in

sexually explicit conduct (sexual intercourse) and video recorded that sexual exploitation. The depiction was uploaded and stored to an Apple iPhone Note on the subject device, thus affecting interstate commerce.

14. Based on the forgoing information, I submit there is probable cause to believe that JORDAN WATTS has violated of Title 18, United States Code Section 2251(a).